

Privacy Notice

Cordale Housing Association Limited ("Cordale") is committed to protecting and respecting your privacy. At Cordale our guiding principles are **Excellence, Respect, Integrity** and **Customer Service** and we ensure that we comply with these principles and applicable data protection law when we process your personal data.

This Privacy Notice explains how Cordale will process your personal data, from when we collect it until we dispose of it. It also explains how we use your personal data, when we will share it with others and how we will keep it secure.

What is personal data?

Personal data is information about you that allows you to be identified. Identification can be by the information alone or when used with any other information we have or are likely to have in the future.

How the law protects you

Your privacy and our use of your personal data is protected by law. Cordale is committed to collecting and using personal data fairly and in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 (as amended or replaced from time to time). Data protection law says that we are allowed to process personal data only if we have a lawful basis to do so. This includes sharing it outside of Cordale. The law says that the basis on which Cordale may process personal data includes:

- When the processing is necessary to fulfil a contract we have with you, or are entering into with you;
- When we have a legal obligation to;
- When it is in Cordale's or a third party's legitimate interests;
- When you consent to it; or
- When the processing is necessary to protect the vital interests of you or another individual.

A "legitimate interest" is when we or a third party have a business or other good reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on legitimate interests, we will tell you what those interests are.

Who we collect personal data on

Customers – current, former and potential customers, who live in our properties or access our services, including Tenants, Factored Owners and Service Users, and their representatives.

Colleagues – current, former and potential colleagues, including volunteers, Management Committee and Sub-Committee Members (the "Governing Body") and those who have a membership with us.

Anyone who makes a complaint or enquiry, uses our website and online services or visits our offices or other premises.

Recording of Telephone Calls

Cordale Housing Association records all telephone calls for training and monitoring purposes. Callers are informed that calls are recorded via a recorded message.

The ability to stop call recording is in place and this will be used in cases where:

- Bank Account details are being given
- Credit or Debit Card details are being given
- Other sensitive information is being transferred to the member of staff
- The caller has requested that the call not be recorded

The recordings will be stored on a secure server for review and monitoring purposes and are only available to authorised staff members. These recordings will be stored for a maximum period of 6 months and from there will automatically be deleted from the server. Once deleted these files are not be recoverable.

Any requests for information involving recorded calls will be managed in accordance with our Subject Access Request procedures. Any recordings downloaded for these purposes are stored in the Associations document management system in a private vault, only accessible by authorised staff members and are retained in line with the Association's retention schedule.

Sharing Data – COVID 19

As a result of current government advice around responding to the challenges presented by Covid-19, it may be necessary for us to record instances where tenants, owners and customers have been affected by the virus or are otherwise self-isolating, and that we share this information with contractors and relevant third parties where necessary to safeguard public health and safety, and to manage service delivery in accordance with government guidelines.

Who we are

Cordale is a Registered Social Landlord in Scotland. We are a Scottish Charity (Scottish Charity No. SC032859) and a registered society under the Co-operative and Community Benefit Societies Act 2014 – Reg No. 2411R(S) with our registered office at 1 Red Row, Renton, Dumbarton, G82 4PL.

Cordale is part of the Caledonia Housing Association Group ("the Group").

Cordale is the controller of your personal data, this means we decide how your personal data is processed and for what purposes.

How to Contact Us

Telephone: 01389 721216

Email: info@Cordalehousing.co.uk

Address: 167 Main Street, Renton, West Dunbartonshire G82 4PF

Opening Times: Monday to Friday 9am – 5pm

Our Data Protection Officer

We have a [Data Protection Officer](#) who is responsible for monitoring our compliance with Data Protection, and is available for you to contact if you have any concerns over how we handle your personal data or if you want to make a request to access your personal data. You can contact our [Data Protection Officer](#) via the contact details above.

People who have a Tenancy Agreement with us

How we collect your personal data

Cordale obtains your information from a variety of sources, including when you:

- Accept an offer of a property
- Sign a tenancy agreement
- Telephone or visit our staff/offices
- Visit our tenant self-service portal
- Complete feedback via Survey Monkey
- Write to or email us
- Request services or repairs from us or ask for our permission
- Raise a complaint with us
- Respond to a survey or consultation
- Are captured by our CCTV systems

What information we collect

Personal Data and Contact Details

Name, addresses, date of birth, gender, national insurance number, relationship / marital status, employment status, pregnancy / maternity status, signature, home telephone number, mobile phone number, email address and IP address.

Next of Kin and Emergency Contact Details

Name, address, relationship to you, home telephone number, mobile telephone number and email address

Tenancy Details

Start and End dates, Tenancy Reference number, references from previous landlords

Household composition—Details of who lives in the property with you, their name, age and gender.

All contact you have with us or we have with you; including any emails, letters or telephone calls.

Complaints made about you or by you

Antisocial behaviour allegations made by you or about you or your household

Unacceptable behaviour warnings

Financial Information

Rent Payments and statements, arrears, income, affordability information

Payment details—bank account details, third party payment details, direct debit mandates

Housing Benefit entitlement and payments, Universal Credit, Council Tax information.

Health

Health conditions relating to accommodation and or service requirements

Disability and Impairments

Disabilities and impairments relating to accommodation and or service requirements.

Communication Requirements/Preferences

Language preferences

Requirements for different communication Formats e.g. large print

Third Party Representatives (optional)

Details of those you wish to communicate with us on your behalf.

Equalities Monitoring Information (optional)

Protected characteristics as detailed in The Equality Act 2010, including gender, race or ethnic origin, religion or belief, sexual orientation, gender reassignment, whether you consider yourself to be disabled or not.

(Note: while this information may be requested by us and provided by you it does not form part of the criteria for accessing our services.)

Information we may receive from Third Parties about you

- Details on your application
- Details of benefits from Department of Works and Pensions or Local Authority
- Payments made to us by you
- Information from representatives acting on your behalf
- Information from welfare or support agencies working with you
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour

People who have a Tenancy Agreement with us

What we use your information for and our reasons

Uses	Reason
Offer a property to you	Necessary to enter into a tenancy agreement with you
Manage your tenancy	Necessary to comply with the tenancy agreement we have with you
Manage your rent and service charge accounts	Necessary to comply with the tenancy agreement we have with you
Provide repairs, maintenance and adaptations of our properties	Necessary to comply with the tenancy agreement we have with you Legal Obligation under applicable housing legislation
Provide you with access to our online self service portal	Our Legitimate Interests to allow you access to information about your tenancy, make service requests and provide feedback.
Carry out surveys and consultation	Legal Obligation under applicable housing legislation Our Legitimate Interests to send you communications requesting your feedback about Cordale, the services it provides and or any proposals or services which we may decide to introduce or change
To offer assistance with debts and benefits	Our Legitimate Interests
To engage with you to get feedback on our services	Legal Obligation under applicable housing legislation Our Legitimate Interests to send you communications requesting your feedback about Cordale
To involve you in our scrutiny, participation and decision making arrangements	Our Legitimate Interests
To send you information on our performance	Legal Obligation Our Legitimate Interests to send you communications about Cordale and its performance
To support our legal and regulatory compliance activities	Legal obligation
Investigate and resolve complaints	To fulfil a contract we have with you Legal Obligation
Investigate and resolve Anti-social behaviour	To fulfil a contract we have with you Legal Obligation
Conduct research and statistical analysis to improve our services.	Our Legitimate Interests
Monitor and evaluate our performance	Our Legitimate Interests to process personal data for the purposes of improving our services to you

Monitor and report on Equalities	Equality of opportunity or treatment – we will process personal data to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people to promote or maintain equality.
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Who we share your information with

We may share your personal data with:

Maintenance contractors who are instructed to carry out repairs or maintenance works.

Out of hours Response and **Warden call** providers to allow support and emergencies to be handled out of hours

Local Authorities regarding your application for housing and Housing Benefit entitlements, payments, Council Tax, and changes to rent and other charges.

Police Scotland, Scottish Fire & Rescue Service and the Scottish Ambulance Service who may require information in order to fulfil their statutory duties or in emergency situations.

Local authorities or others involved in investigating a complaint.

Utilities companies to ensure billing information is up to date, including forwarding addresses.

Debt collection agencies appointed by utility companies, for the purpose of avoiding legal proceedings being raised against us.

Payment processors, Local authorities, Department of Work and Pensions regarding investigating payments made or otherwise

We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external **debt advice agency, Welfare Rights Advisor**, the **Housing Benefit department** or the **Local Authority housing advice and homeless prevention team** to make sure that benefits are paid correctly.

Sheriff Officers, Debt Recovery Agencies and **Solicitors** if you default on any tenancy conditions, to enable the recovery of debt or property.

Survey and Research companies who conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you.

Our partner associations **Caledonia and Bellsmyre** to provide local services in your area.

Mail distribution services in order to provide newsletters and service information.

If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners.

The Scottish Housing Regulator and other regulatory bodies who may require information in order to fulfil their statutory duties

Consultants engaged to provide Public Relations and Communications, including crisis management, support and services.

Auditors engaged to carry out checks and verifications of our systems, processes and financial accounts

IT software providers who supply and host our management information / database systems

People who receive a Factoring Service

How we collect your personal data

Cordale obtains your personal data from your factoring agreement with us and related correspondence.

What Information we collect

Personal Data and Contact Details

Name, address, email address, telephone number(s).

Financial Information

Bank details

What we use your information for and our reasons

Uses	Reason
Manage your Factoring Service	To fulfil a contract we have with you
Manage your Service Charge Account	To fulfil a contract we have with you
To engage with you to get feedback on our services	Our Legitimate Interests to send you communications requesting feedback about Cordale

Who we share your information with

Maintenance contractors who are instructed to carry out repairs or maintenance works.

Payment processors regarding investigating payments made or otherwise.

Sheriff Officers, Debt Recovery Agencies and Solicitors if you default on your Factoring Agreement and to enable the recovery of debt.

Survey and Research companies who conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you.

Mail distribution services in order to provide newsletters and service information.

IT software providers who supply and host our management information / database systems

People who have Shared Ownership or Shared Equity housing with us

How we collect your personal data

Cordale obtains your information from your Application and Interview form.

What Information we collect

Personal Information and Contact Details

Name, addresses, date of birth, email address, telephone number, housing circumstances.

Household composition—the name, age and gender of those who are members of your household.

Financial Information

Mortgage provider, solicitor, income, expenditure and savings..

What we use your information for and our reasons

Uses	Reason
To be allocated shared ownership or equity housing	To enter into a contract with you
To allow occupancy agreement to be drawn up	To enter into a contract with you
Maintain your Occupancy Agreement	To fulfil a contract we have with you

Who we share your information with

Scottish Government to confirm purchase.

Solicitors to draw up agreements for sale / purchase.

Payment processors regarding investigating payments made or otherwise.

Sheriff Officers, Debt Recovery Agencies and Solicitors if you default on your Factoring Agreement and to enable the recovery of debt.

Survey and Research companies who conduct surveys and research on our behalf which allow us to gather feedback on the services we offer you.

IT software providers who supply and host our management information / database systems

People who apply to work with us

How we collect your personal data

Cordale obtains your information when you complete an employment application

What information we collect

Personal Data and Contact Details

Name, address, email address, telephone number(s).

Experience

Previous employers and details of previous roles, education, references.

Answers to questions relevant to the role applied for.

Equalities Monitoring Information (optional)

Protected characteristics as detailed in The Equality Act 2010, including gender, race or ethnic origin, religion or belief, sexual orientation, gender reassignment, whether you consider yourself to be disabled or not.

(Note: while this information may be requested by us and provided by you it does not form part of the recruitment and selection process.)

Close Connections

Relationship to staff employed by organisations within the Group or to members of their Governing Bodies.

What we use your information for and our reasons

Uses	Reason
Assessing your suitability for the role you have applied for	Enter into a Contract with you
Monitor and report on Equalities	Equality of opportunity or treatment – we will process personal data to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people to promote or maintain equality.

Who we share your information with

We use an online application system, which is supplied by **VacancyFiller**. Once you click 'apply now' you will be taken to Vacancy Filler's website. They will hold the information you submit and staff employed by the Group who are directly involved in the recruitment process will have access to it.

Vacancy Filler has a Privacy Notice, which provides further information about how it handles your personal data: <https://www.vacancy-filler.co.uk/privacy-policy/>

People who apply to be on our Governing Body

How we collect your personal data

Cordale obtains your information when you complete an application, eligibility or nomination form and from your membership details.

What Information we collect

Personal Information and Contact Details

Name, address, email address, telephone number, signature.

Experience

Biographical details including employment history and details of previous roles, education and references

Answers to questions relevant to the role applied for.

Equalities Monitoring Information (optional)

Protected characteristics as detailed in The Equality Act 2010, including gender, race or ethnic origin, religion or belief, sexual orientation, gender reassignment, whether you consider yourself to be disabled or not.

(Note: while this information may be requested by us and provided by you it does not form part of the eligibility criteria and selection process.)

Close Connections

Relationships to tenants or staff of organisations within the Group or to members of their Governing Bodies.

What we use your information for and our reasons

Uses	Reason
Assessing your suitability and eligibility for the role you have applied for	Our legitimate interests
Monitor and report on Equalities	Equality of opportunity or treatment – we will process personal data to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people to promote or maintain equality.

Who we share your information with

We do not share any personal data at application stage.

People who apply to volunteer with us

How we collect your personal data

Cordale obtains your information when you complete an application form.

What information we collect

Personal Information and Contact Details

Name, address, email address, telephone number(s).

Experience and Biographical Details

Previous employers and details of role, education, references.

Answers to questions relevant to the role applied for.

What we use your information for and our reasons

Uses	Reason
Assessing your suitability for the role you have applied for	Our legitimate interests

Who we share your information with

We do not share information at application stage.

People who have Membership of the Association

How we collect your personal data

Cordale obtains your information when you complete an application form.

What Information we collect

Personal Data and Contact Details

Name, address, email address, telephone number(s), date of birth, signature.

Equalities Monitoring Information (optional)

Protected characteristics as detailed in The Equality Act 2010, including gender, race or ethnic origin, religion or belief, sexual orientation, gender reassignment, whether you consider yourself to be disabled or not.

(Note: while this information may be requested by us and provided by you it does not form part of the eligibility criteria and membership application process.)

What we use your information for and our reasons

Uses	Reason
To manage your membership	Necessary to comply with the terms of our constitution (our rules), which is a contract among the members of Cordale
Equalities Monitoring	Equality of opportunity or treatment – we will process personal data to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people to promote or maintain equality.

Who we share your information with

Public - on request the register of members must be made publicly available at our registered office. This register includes name and membership number.

Anyone with an interest in Cordale, such as lenders or investors.

The Scottish Housing Regulator and other regulatory bodies who may require information in order to fulfil their statutory duties

Auditors engaged to carry out checks and verifications of our systems, processes and financial accounts

People who complain to us

How we collect your personal data

We collect your personal data when you raise a complaint with us via the telephone, in person, via a complaints form, email or letter.

What information we collect

Personal Information and Contact Details

Name, address, email address, telephone number(s), signature.

Complaint Details

Any information you provide us in relation to the complaint.

What we use your information for and our reasons

Uses	Reason
To investigate complaint and provide outcome	Legal Obligation
To monitor and report on complaint statistics	Legal Obligation Legitimate Interests

Who we share your information with

If you have made a complaint about another individual it is not always possible to investigate and resolve it fully on an anonymous basis. If a complainant doesn't want information identifying him or her to be disclosed however, we will respect that.

We record and monitor complaints via our management information system, which is supplied and hosted by an external IT software provider.

If you have made a complaint about a staff member, your details and the nature of your complaint, will only be disclosed to the staff member's line manager(s).

People who enquire, or ask us for information, about us

How we collect your personal data

We collect your information when you submit your enquiry or request via the telephone, in person, email or letter.

What information we collect

Personal Data and Contact Details

Name, address, email address, telephone number(s).

Enquiry or request details

Any information you have provided as part of your enquiry or request.

What we use your information for and our reasons

Uses	Reason
To respond to the enquiry or request	Legitimate interests
To monitor and report on the enquiries or requests we receive.	Our legitimate interests to improve our services

Who we share your information with

We do not share your information.

Consent

If we are processing your personal data based on your consent then this will be made clear to you and will always be separate from any other matter.

If you do give us consent to process your personal data then you will have the right to withdraw this consent at any time. You will always be informed on how to withdraw your consent when we obtain it. If you are unsure please do not hesitate to contact our [Data Protection Officer](#).

How long we keep your information

We only hold your personal data for as long as necessary to fulfil the purpose it was collected for, as required by law or as set out in any relevant contract we have with you. Personal data which is no longer required will be destroyed securely.

Our records retention schedule is available on our website. This sets out the different records we hold and how long we retain these for.

Your Rights

You have certain rights under Data Protection laws to ensure you remain in control of your personal data.

Right of Access

You have the right to ask for copies of the information about you that is held by us. This is commonly known as a Subject Access Request. We are required to respond to this request within one month.

Right to Rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete. If we have disclosed this to third parties, we will tell you if this is appropriate and we will inform them of the rectification where possible.

We must respond within one month, extendable by two months where the request for rectification is complex.

Right to Erasure

You have the right to request the deletion of personal data where there is no compelling reason for its continued processing or if we are processing it in an unlawful manner – for example if we are using it for a different purpose than originally stated.

Right to Restrict Processing

You have a right to ‘block’ or suppress processing of your personal data, under certain circumstances. When processing is restricted, we are permitted to store the personal data, but not further process it. We can also retain just enough information about you to ensure that the restriction is respected in future.

Right to Data Portability

You can obtain and reuse your personal data for your own purposes across different services. This right applies where the processing is based on your consent or for the performance of a contract; and when processing is carried out by automated means.

Right to Object

You have the right to object to:

- Processing based on legitimate interest or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics in certain limited circumstances.

How to use your rights

Please contact our [Data Protection Officer](#) who will guide you through how to make any requests in relation to your data rights, or if you have any other queries about the Data Protection laws or our Data Protection Policy.

Security

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you. You can read our full Data Protection Policy on our website.

Transfers outside the UK and Europe

We do not transfer personal data outside of the United Kingdom.

Marketing

We do not share or sell your personal data to third parties for marketing purposes.

Further Processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Sharing personal data

As set out in this Privacy Notice, we may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations imposed both upon us and upon you. Such organisations include the Scottish Housing Regulator, Scottish and UK courts and / or local authorities. We may also share personal data with our or your other professional advisors for the purposes of taking advice and the event of any legal claims.

Where we employ third party suppliers to provide services on our behalf, these suppliers may process personal data on our behalf as "processors" and are subject to written contractual conditions to only process that personal data under our instructions and protect it. In the event that we do share personal information with external third parties, we will only share such personal data as is strictly required for the specific purposes and we will take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

Maintaining your Information

It is important that we have up to date information about you, if any of your details change please contact Customer Services to inform us of these, to allow us to keep our records up to date. Occasionally when you contact us we may ask you to confirm if your information is still up to date.

Complaints about how we handle your personal data

If you have any concerns regarding how we handle your personal data please contact our [Data Protection Officer](#) who will investigate your concern in confidence.

You also have the right to complain directly to the Information Commissioner's Office (ICO) in relation to how we handle your personal data:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 Email: casework@ico.org.uk

Changes to this Notice

This privacy notice will be updated to reflect changes either to the way we operate or changes to the data protection legislation. To ensure that you keep up to date, we suggest you revisit this notice from time to time.

This Privacy Notice was last updated on 09th June 2022.